

ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE REGULATORY CONTACT RECORD

Date/Time: November 8, 1999 / approximately 11:00 a.m.

Site Contact(s): Ted Hopkins **Phone:** 966-7652
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Agency: Colorado Department of Public Health & Environment

Purpose of Contact: Self-disclosure of audit findings for buildings 776/777 and 374.

Discussion

K-H Team conducted a self-assessment of Buildings 777/776 and Building 374 to evaluate the environmental compliance with all applicable regulations and permit requirements. The Building 776/777 assessment is still ongoing while the Building 374 assessment was completed on November 3, 1999. The following findings are associated with these audits:

B776/777

1. Aisle Spacing

Inspection logsheets for rooms 134, 154, 159, and 127 of RCRA Unit 776.1 indicate that on several occasions [11/25/97-12/16/97; 3/24/98-4/21/98; 5/17/99-6/14/99 and 8/30/99-9/27/99] the aisle space was less than 26". Each instance was corrected in a timely manner from the point of discovery.

2. INSPECTIONS and INSPECTION LOGSHEETS

Areas of Review

- i) Unit 777.1 Room 443 and NDT Vault
- ii) Unit 776.3 ASRF
- iii) Unit 61 SRV
- iv) Hazardous Waste Management Daily Visible Liquid Inspection Log Sheet #2
- v) Spill Response Cabinet Daily Inspection Log #1



FINDINGS:

- A) Inspection logsheets do not have the time inspections were conducted;
 - B) Unit 61 requires the status of activity relative to entry into and closure planning be entered on logsheets every three months. Nothing recorded on logsheet for six months. This requirement is driven per note 5 on logsheet;
 - C) Unit 61 logsheet, since January 1999, it has been recorded there is liquid and debris in the SRV. No corrective actions noted;
 - D) Inspection logsheets for Unit 776.3 (since 1996) recorded liquid and debris in ASRF. No corrective measures taken;
 - E) ASRF contains empty tanks from B771. These tanks removed and emptied in early 1989. Regulated status of these tanks not clarified;
 - F) Hazardous Waste Management Daily Visible Liquid Inspection Log Sheet #2 for January 8, 1999 is signed and dated but not completed;
 - G) Several times during 1999 inspectors noted on the Hazardous Waste Management Daily Visible Liquid Inspection Log Sheet #2, that water was in the elevator shaft. Corrective actions were not identified;
 - H) On October 3, 1999, no date was recorded on the Spill Response Cabinet Daily Inspection Log #1; and,
 - I) Training records for an inspector brought into B777/776 from B444 were reviewed. An apparent lapse in training was identified approximately four years ago. The inspector claims the lapse was less than one month and that she was and is current in her training. Further evaluation is required.
3. Inspections for Units 2273, 2457, and 2466 were performed but not recorded at the time of inspection for the last week of September. The following week the inspector recorded the inspection results and noted on log the reason the inspections were not recorded when conducted. Inspections were made as required by regulation.
4. Vacuum pump associated with accumulator V-605 was not being inspected as ancillary equipment. Inspectors did not consider the vacuum pump to be ancillary equipment, as they believed it did not directly contact hazardous waste. A re-assessment of the unique plumbing of this system questions this interpretation. The inspectors have been directed to conduct daily inspections of the ancillary equipment starting immediately. Additionally, vacuum accumulators in Building 777 will be evaluated for inclusion in the Subpart BB organic air-monitoring program.
5. Waste and Environmental Management System (WEMS)
Containers in Units 776.1 and 777.1 were checked against WEMS and some discrepancies were noted.
6. A filter associated with a RCRA tank system located under GB 465 was identified as leaking in March 1998 and was scheduled for removal. Corrective action was taken to ensure that no waste is released to the

containment area (the filter was wrapped in plastic). The filter will be removed as part of scheduled D&D activities.

7. RCRA Permit drawing for Unit 776.1 Rooms 134, 154 and 159 does not show the current location of the radiological anti-contamination clothing dress out area.
8. Inspections of ancillary piping (reverse flow line) traversing through the tunnel from B771 to B776 have not been conducted as required.

B374

PERMIT MODIFICATIONS AND CLARIFICATION OF TYPOGRAPHICAL ERRORS

1. The Part B Permit modification 99-3 was approved by CDPHE on August 17, 1999 and was to be implemented immediately. The facility implemented the modification on September 27, 1999 with the issuance of the modified Tank Status Sheets.
2. Some minor Treatment Unit Specific Conditions listed in the Permit do not match the permitted facility conditions for:
 - Section V.C.7.2 process control variables for normality (30 N)
 - Section V.C.7.6 tank D848 is not listed on page 1
 - Tanks D825 A&B and D844 A&B do not have conventional overflow piping;
 - Section V.C.7.4 Tanks T802-805 do not have overflow piping. As vapor body tanks they have pressure relief valves;
 - Tanks D830, D832, D834 and D876 do not have overflow piping. As flash tanks they have a process loop system;

INSPECTION and INSPECTION LOGSHEETS

3. Unit 374.3 Daily inspections of the alarms and volumes in the tank system were not documented on some occasions.
4. Waste and Environmental Management System (WEMS)
Containers in B374 were checked against WEMS and some discrepancies were noted.

SPILL CONTROL EQUIPMENT

5. Inspection log sheets indicated that spill response equipment was adequate, accessible, and in good working condition when the equipment had not been looked at for years. Spill equipment in Building 428 was last inventoried in 1996. Building 231 spill equipment cabinet did not list an inventory of the spill equipment contained in the cabinet. Spill equipment for B231, B428 and Valve Vaults was not analyzed annually to determine serviceability nor was an inventory kept at or near the units.

6. An inspector conducting daily inspections did not complete the entire site-required qualification package (theoretical knowledge verification) required to perform on-site inspections of RCRA units. All other classes had been completed. The inspector was removed from the list of qualified personnel and a note to the file was entered for the four inspections completed by the inspector.
7. RCRA Waste Tank Status Sheets must be changed to show the correct information for:
 - FL803 and W803.

A corrective action plan will be formulated and entered into the Site Environmental Corrective Action Tracking System within 15 business days.

Contact Record Prepared By: Bob Cathel, RMRS Environmental Compliance

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